



NATIONAL ASSOCIATION OF THE DEAF

814 THAYER AVENUE • SILVER SPRING, MARYLAND • 20910-4500

HEADQUARTERS: 301-587-1788 VOICE • 301-587-1789 TTY • 301-587-1791 FAX

LAW CENTER: 301-587-7730 VOICE • 301-587-7730 TTY • 301-587-1791 FAX

BOOKSTORE: 301-587-6282 VOICE • 301-587-6283 TTY • 301-587-4873 FAX

October 8, 2001

Magalie Roman Salas, Secretary
Federal Communication Commission
445 12th Street SW, Room TW B-204
Washington, DC 20554

Reply Comments: Re: CC Docket 98-146, In the Matter of Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996

Dear Ms. Salas:

The National Association of the Deaf (NAD), the nation's oldest and largest consumer organization representing Americans who are deaf and hard of hearing, appreciates the opportunity to respond to comments filed in response to the Commission's Notice of Inquiry (NOI) on advanced telecommunications services. We are joined in these comments by the Association of Late Deafened Adults (Marylyn Howe, ALDA President) and the Consumer Action Network (Cheryl Heppner, CAN Executive Committee).

Not Being "Deployed in a Reasonable and Timely Fashion"

The NAD notes that many commenters agreed with us that high-speed deployment is slow. It is not moving forward with sufficient speed. While the percentage increases reported by various carriers are indeed impressive, this is simply a function of the small

base. Viz.: if SBC were to add 5 DSL subscribers to its total of 10, that's a 50% increase. The fact remains that there are only 15 subscribers. This illustrates the problem. In a nation of 90 million households, the fact that barely more than 3 million households *and* small businesses were high-speed subscribers as of 12/31/00 is discouraging. Intel, the Progress and Freedom Foundation, Alcatel USA, and others agreed with us that the Commission should not be satisfied with the pace of growth.

Uneven Deployment

The Alliance for Public Technology (APT) and the World Institute on Disability (WID), in their comments, noted that deployment is not by any means even between the various alternatives -- DSL, cable modem, wireless, satellite, etc. Rather, cable modem is far ahead. In our comments, the NAD noted that deaf and hard of hearing Americans stand to benefit more from DSL than from cable. This is because DSL lends itself more to video conferencing (which is potentially of huge importance to the people we represent) notably because downstream and upstream speeds are equivalent. Cable, by contrast, tends to provide high speeds only in one direction; that severely compromises the potential of video telephony. Intel made a similar point, predicting that video on demand would be of huge interest to the American population. These technologies will not reach Americans who could benefit unless the FCC creates a more level playing field.

We concur with APT/WID, Intel, and other commenters who urged the FCC to take a technology-neutral position. Cable should not remain unregulated vis a vis DSL. Rather, the playing field should be much more level than it now is.

A related point: the NAD noted in its comments that \$40 to \$50 per month (on top of plain old telephone service, POTS) is a lot of money for most deaf and hard of hearing Americans. We need to see these prices come down. The NAD believes that robust competition is our best bet.

Tax Credits

In our comments, the NAD noted that its membership, meeting at convention in mid-2000, passed a resolution calling upon Congress to create tax credits for companies that invest in communication-enhancing technologies. While we recognize that tax credits are under Congress's jurisdiction, we urge the FCC to ask Congress to enact tax credits for small and large businesses that use high-speed services and have employees with disabilities. Telecommuting is an essential option for many workers and would-be workers with disabilities. We were pleased to see that the Texas PUC, the city of Plano (TX), Qwest, and others called for tax credits.

The NAD, with ALDA and CAN, appreciates this opportunity to submit reply comments.

Sincerely,

A handwritten signature in black ink that reads "Nancy J. Bloch". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Nancy J. Bloch
Executive Director

cc: Marylyn Howe, ALDA
Cheryl Heppner, CAN